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0801 '99 MAY 17 10:13

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville MD 20852

Re: Docket #98N-1038 "Irradiation in the production, processing and handling of food."

May 8, 1999

Sir/Madam:

I am writing to express my concerns that you are considering removing the requirement that all irradiated foods be labeled. Since irradiation is a "material fact" about the processing of a food as you have stated in your initial petition, it should be disclosed when a food has undergone this process. Therefore, retain the current terminology in which irradiated foods are labeled "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated foods. Any phrase using the term "pasturization" is misleading, because pasturization is an entirely different process. Some irradiated foods have different textures or nutrient losses which are not obvious to the consumer. Only disclosing that a food has been irradiated informs the consumer of this possibility. Also, because this technology is new and the public health effects of irradiated foods needs to be assessed, the FDA's labeling requirement should not be permitted to expire.

Sincerely,



Kata F. Orndorff

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Kata F. Olander
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